part 2

ATTACHMENT C

Vote Solar Comments

Docket No. PUR-2020-00048

NCLC National Consumer Law Center

The Need for Utility Reporting of Key Credit and Collections Data Now and After the Covid-19 Crisis

April 2020

Introduction

The challenges posed by the Covid-19 crisis have heightened the importance of sustained, affordable access to essential home energy service for all households across the nation. Yet, there is currently only limited capacity in the U.S. to gain a clear, data-driven understanding of the number of households that lose access to home energy services and otherwise struggle with utility affordability and security. Without the data, home energy affordability challenges and their often-dire consequences remain invisible, and the effectiveness of utility credit and collections practices cannot be assessed. Further, development and implementation of effective programs and policies to address access and affordability challenges is thwarted by lack of data. There is a pressing need to step up utility collection and public reporting of data reflecting service disconnections and restorations, as well as other measures of home energy security.[1]

Following is a list of data points that advocates and others can obtain through information requests in regulated utility proceedings and at public meetings of municipally or cooperatively owned utilities. After initial receipt of monthly, advocates may request adoption of provisions to secure on-going, public reporting.

This document also includes citations to a sampling of data reporting protocols adopted at the state level, and to resolutions adopted by the National Association of State Utility Consumer Advocates (NASUCA) and the National Association Regulatory Utility Commissions (NARUC) calling for comprehensive utility data reporting.

Key Data Points

Most states do not require electric or gas service providers to report the key data points needed to determine the extent to which residential customers are affordably accessing and retaining essential utility service. Understanding affordability and home energy security challenges that stem not only from utility bills, but also from credit and collection protocols, requires more than

[1] "Home energy security" as used here refers to sustained, affordable access to necessary service without foregoing (1) other necessities such as food and medicine, (2) maintenance of healthy indoor temperatures, (3) lighting and refrigeration necessary for health, safety well-being, or (4) access to and operation of essential communications services.

raw service disconnection numbers. **Getting a clearer picture requires obtaining monthly data - *for both general residential customers and identified low-income residential customers* - at a minimum, using the following data points *by zip code*:**

- Number of customers,
- Dollar amount billed,
- Number of customers charged a late payment fee,
- Dollar value of late fees collected,
- Number of customers with an arrearage balance by vintage
    - 60 – 90 days
    - 90+ days,
- Dollar value of arrearages by vintage
    - 60 – 90 days
    - 90+ days
- Number of disconnection notices sent
- Number of disconnections for nonpayment
- Number of service restorations after disconnection for nonpayment
- Average duration of disconnection
- Dollar value of level of security deposits collected
- Number of security deposits collected,
- Number of new deferred payment agreements entered into
- Average repayment term of new deferred payment agreements
- Successfully completed deferred payment agreements, and
- Average repayment term of payment agreements.

Examples of States with Existing Data Reporting Protocols

There are a few states where investor-owned utility data reporting is, while imperfect, fairly good in a relative sense. (*Most* cooperative and municipal/Public Utility District utilities do not currently report any credit and collections data.) The states cited below are among those with more comprehensive reporting protocols.

Ohio has one of the most detailed data reporting protocols in the country. In terms of the frequency and comprehensiveness of information collected and reported, the Ohio reporting template (PIPP Metrics Report Template) may be found HERE, and presents a good model.

California's electric and gas investor-owned utility data reporting is also relatively comprehensive and informational. California requires electric and gas investor-owned utilities (IOUs) to report quarterly arrearages, disconnections, disconnection notices, restorations, and a range of other key data points separately for general residential customers, low-income

customers participating in a low-income efficiency or discount program, and customers receiving the "medical baseline" rate. A recent report (SCE Quarterly Disconnect Report...) may be found HERE.

In **Pennsylvania,** electric and gas IOUs have long reported key credit and collections data. The Pennsylvania Utility Commission's Bureau of Consumer Services issues an annual Universal Service Programs and Collections Performance Report delineating disconnections, reconnections, deferred payment agreements and other key data points.

Iowa electric and gas utilities have reported on some (but not all) critical credit, collections and energy security data points since 1999. A spreadsheet (Iowa Moratorium Report) shows time-series data and charts documenting general residential and low-income customer trends over the past 20 years. The spreadsheet includes a number of calculated fields that allow for *rates* of disconnections, arrearages, and other pertinent information to be displayed, which can be more useful than looking at raw numbers alone.

Some other states have also implemented reasonable data reporting protocol, but most have not. It is no coincidence that in many of the states where there are few or no reporting requirements, there are also weak consumer protections and a lack of effective low-income energy affordability and efficiency programs. These consumer protection and programmatic deficiencies present particular threats to home energy security in light of the Covid-19 crisis.

Utility Reaction to Requests for Data Reporting

Utilities are generally not thrilled when advocates, regulators, or policymakers propose that comprehensive credit and collections data be collected and reported. They are perhaps understandably reticent about initiating a process whereby they trumpet to the world the number of their customers they shut off every month and that their franchised service is unaffordable to some.

Invariably, when faced with a request to collect and report — either regularly on an ongoing basis, or through response to discovery requests — utilities state that their information technology systems cannot accommodate the task, the cost is too high, they don't track the requested information, or and that the request is unduly burdensome. But the fact is, utilities know which customers are behind on their bills, receive disconnection notices, have service disconnected or restored, and enter into deferred payment agreements. There are sufficient examples of successful reporting that demonstrate the potential for implementation.

Why Zip Code Level Reporting?

Some national and regional data sets show disparities by race in disconnections and other important energy security metrics — even after controlling for income. These disparities raise profound racial justice concerns and highlight the importance of obtaining utility-specific credit and collections data at the zip code, or even census tract level. Geographically granular data is needed to flag any disparities, but also to inform targeting of effective energy efficiency and other affordable energy programming. There are currently no utilities that report regularly on a geographically granular level. But asking for and obtaining such information in regulatory proceedings, co-op meetings, or municipal utility meetings is required to ensure equity.

Community Organizing Potential

While getting new reporting protocols in place may involve some contention at the outset, a grassroots campaign to initiate reporting can serve as an effective community organizing tool. Mobilizing around a push for the requirement that we have information about people who cannot retain access to basic service can help build organizational strength, energize people at the grassroots, and lead to real, material change in peoples' lives.

Resolutions of National Consumer and Regulatory Agency Associations and Other Resources

It is important to note that in 2019 for the first time, NARUC and NASUCA jointly adopted a resolution on utility reporting of credit and collections data. The resolution may be found HERE. This idea is becoming mainstream.

Conclusion

Getting good data is an essential first step in grappling both with energy security challenges in the short term and helping ensure sustained security in the long term.

The National Consumer Law Center (NCLC) can help state and local advocates and community organizations to develop data collection and reporting campaigns both inside and outside of the regulatory commission's hearing room. For more information, please contact NCLC Senior Energy Analyst John Howat at jhowat@nclc.org.

ATTACHMENT D

Vote Solar Comments

Docket No. PUR-2020-00048

National Consumer Law Center

Fighting Together for Economic Justice

Electric Service Discount and Arrearage Management Program Design Template

John Howat
National Consumer Law Center®

April 2020

NCLC National Consumer Law Center

Fighting Together for Economic Justice

ABOUT THE NATIONAL CONSUMER LAW CENTER

Since 1969, the nonprofit National Consumer Law Center® (NCLC®) has used its expertise in consumer law and energy policy to work for consumer justice and economic security for low-income and other disadvantaged people, in the United States. NCLC's expertise includes policy analysis and advocacy; consumer law and energy publications; litigation; expert witness services; and training and advice for advocates. NCLC works with nonprofit and legal services organizations, private attorneys, policymakers, and federal and state governments and courts across the nation to stop exploitive practices, help financially stressed families build and retain wealth, and advance economic fairness.

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ABOUT THE AUTHOR

John Howat is Senior Energy Analyst at the National Consumer Law Center (NCLC) and has been involved with energy programs and policy issues since 1981. Areas of expertise include: design and analysis of low income energy affordability and efficiency programs, utility rate design, low-income utility consumer protections, energy expenditure and burden analysis, prepayment and advanced metering, utility credit reporting, development and analysis of utility arrearage and customer service data, and analysis of program participation and outreach efforts. At National Consumer Law Center over the past 21 years, John has managed a range of projects across the country in support of low-income consumers' access to affordable utility and energy-related services and testified in over 60 regulatory proceedings in 20 states. He is a contributing author of NCLC's *Access to Utility Service*.

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I. BACKGROUND AND PROGRAM DESIGN OBJECTIVES

As the health, safety, and economic impacts of the Covid-19 crisis become increasingly clear, the need to universally adopt programs and policies that enhance the affordability of necessary utility service is also highlighted. To win approval of programs and policies to enhance secure access to home energy services, advocates must "make the case" for program need and present a data-driven proposal outlining program design parameters. National Consumer Law Center has developed customizable templates to aid advocates and consumers in developing proposals for the implementation of comprehensive electric service bill payment assistance and arrearage management programs. While this resource applies directly to electric utility service, many of the design and implementation principles are also applicable to natural gas and water service.

Reliable electricity service is a necessity of life. Without electricity, residents cannot effectively participate in present-day society or be secure from threats to their health and safety. Looking forward, as technological, economic and regulatory changes usher in a transition to increased electrification in the transportation and building sectors, the importance of secure, uninterrupted access to electricity service is heightened. All customers, including those with low incomes, need access to reliable and secure sources of electricity. To help ensure home energy security for low-income residents, what is needed is an electricity affordability program that:

- Serves all residential electricity customers eligible to participate in the Low Income Home Energy Assistance Program ("LIHEAP");
- Lowers program participants' electricity burdens to an affordable level;
- Promotes regular, timely payment of electric bills by program participants;
- Comprehensively addresses payment problems associated with program participants' current and past-due bills;
- Is funded through a mechanism that is reliable while providing sufficient resources to meet policy objectives over an extended timeframe; and
- Is administered efficiently and effectively.

Following is a discussion of each of these program design objectives.

Program eligibility guidelines, participation, and enrollment

Income eligibility for participation in an electricity affordability program should be capped at no less than state-specific LIHEAP income-eligibility guideline. All households receiving or eligible for benefits through the federal LIHEAP should be automatically enrolled in an electric affordability program. In the event that the electricity affordability program's participation level does not exceed any enrollment ceiling that may be established, consenting households receiving benefits from other means-tested benefit programs (e.g., SNAP, Medicaid) should also be automatically enrolled in the electricity affordability program.

Program benefits

Affordability program participants should receive benefits in the form of discounted electric rates or fixed credits on their electric bills. The goal of a comprehensive affordability program should be to substantially lower the electricity burden[1] of participants. To meet this objective, one of the following should be funded and implemented:

- Percentage discount of at least 30%;
- Percentage of income payment plan ("PIPP") lowering *all* participants' electricity bill payments to 6% or less of household income; or
- Tiered discount setting payments at a targeted electricity burden level of 6% or less.

These program types, currently offered in many states around the country, are described in greater detail below. Templates to determine program costs and non-participant bill impacts are also provided.

Incorporation of arrearage management into an affordable current bill program

To sustain participants' bill affordability and home energy security, program design must be comprehensive in its approach to dealing with both participants' current bills and arrearage balances. A program that is intended to promote regular, timely payments by reducing electricity burdens to an affordable level is rendered less effective by a requirement that participants pay off an arrearage in addition to the affordable current bill. Requiring the simultaneous payment of pre-existing arrears *and* the discounted electric bill therefore runs counter to the policy objectives of promoting affordable, regular, timely payments by program participants.

There are two basic models of low-income utility arrearage management that have been implemented in the United States. One entails the write-down of customer arrears over time after a series of timely payments on current bills. The other model entails the retirement of arrearage balances in full on a one-time basis. The one-time "forgiveness" model is administratively straightforward but entails a large initial outlay of program cash resources. Write-downs over a period of 12 months may provide customers with an enhanced incentive to keep up with current bills (as long as they are affordable), while placing less strain on program cash flow. The most prevalent model provides low-income rate participants with opportunities to retire one-twelfth (1/12) of a pre-program overdue balance with each timely payment of a current bill.

Program funding

Funding for an electricity affordability program needs to be sufficient and reliable. Program funding should be sufficient to provide meaningful energy burden reduction and energy security for LIHEAP-eligible electricity customers. In addition, program administration costs of 5% to 7% of program benefits to the total program cost estimate are required.

[1] The term "electricity burden" refers to the proportion of household income that is devoted to paying for residential electricity service. The terms "energy burden" and "home energy burden" refer to the proportion of income devoted to all home energy services.

A sustainable electricity affordability program with set benefit levels and participation rates also requires funding that is predictable and reliable. A uniform volumetric charge – approved prior to program implementation – is the optimal funding source for an effective program.

Program administration

Electricity affordability program design should foster efficient, streamline administrative procedures. With limited program resources available, funds should be devoted to participant benefits rather than administrative costs to the greatest extent feasible. Minimizing administrative costs while delivering an effective electricity affordability program requires that certain agencies, organizations and individuals work together cooperatively and efficiently. Administrative structures and procedures that apply to the state's LIHEAP may be "piggybacked" onto any new electricity affordability program to create administrative efficiencies.

Community Action Agencies, with sufficient support from program administrative funds, are ideally suited to conduct program intake and outreach functions. The agencies that certify LIHEAP eligibility could simultaneously certify low-income rate and arrearage management eligibility using the same procedures that currently apply to LIHEAP.

Utilities would be responsible for collecting program-related charges, and assigning qualified customers to a tariffed, low-income rate. Utilities would further be responsible for tracking arrearage write-downs for each participating customer, and for regular reporting of program activities and financial transactions. All program costs, including bill credits or discounts, approved startup and ongoing administrative expenses, and approved arrearage retirement amounts should be recoverable through volumetric charges, as described above.

Affordability rate applicants would provide the documentation required for certification on an annual basis. In addition, program applicants should be referred to all appropriate energy efficiency services that may be available.

Utility system costs of program implementation

Most prospective low-income assistance program costs may be readily identified and quantified. Projecting the cost of implementing the affordability program requires multiplying the projected number of program participants by the sum of the value of the monthly discount (or revenue loss) per customer and the average arrearage per customer that is retired. Program administration costs must then be added to the value of discounts and retired arrearages to obtain an estimate of total program costs.

Utility system, societal, and customer benefits

Quantifying the entire range of program benefits, including those associated with utility uncollectible accounts, presents a greater analytical challenge than quantifying costs. Nonetheless, quantification challenges should not lead to the conclusion that benefits simply do not exist. Rather, they suggest that decisions regarding the adoption and implementation of low-income payment assistance programs should not hinge entirely on the results of overly simplified cost-benefit analyses.

Effective bill payment assistance programming may reduce uncollectible account write-offs. Precise quantification of the bad debt mitigation impact of a low-income payment assistance program presents a considerable analytical challenge, particularly on a prospective basis. The extent to which this objective may be achieved is contingent on a number of existing conditions and key program design/implementation elements, including the following:

A company's existing bad debt profile and the extent to which uncollectible account write-offs are currently concentrated among low-income customers;

- Income and expense circumstances of the program participants;
- Program benefit levels and reduction of participants' utility burden (i.e., reduction of the proportion of a participant's income that is devoted to utility bills);
- Outreach and targeting of "payment troubled" customers and prospective program participants;
- The extent to which the program comprehensively incorporates reduction of current bills with means of effectively managing pre-program arrears; and
- Contact and follow-up with program participants.

Comprehensive bill affordability program costs are generally limited to non-participants within the utility system. However, program benefits accrue to participants (enhanced "home energy security," health and safety, housing security, and more), and society more broadly (reduced public health expenditures, reduced need for other transfer payments, and more). These benefits are more difficult to quantify than program costs but must nonetheless be factored into decisions regarding adoption of new programs.

Straight percentage discounts

A straight discount entails reducing the total utility bill by a specified percentage or dollar amount. Under this model, the discount may be achieved through a set customer charge reduction and/or a usage charge reduction. The states of California and Massachusetts have adopted straight discount rates that are available to utility customers who participate in LIHEAP. The straight discount model reduces the energy burden of participants at a relatively low administrative cost. However, this model does not differentiate the benefit level within the broad participant group. The benefit level is the same for a household living at 50% of the federal poverty level as it is for a household living at the upper limit of the income eligibility guideline.

Percentage of income payment plan (PIPP)

A PIPP entails participating customers paying a predetermined, "affordable" percentage of income for natural gas or electric service. PIPPs therefore target benefit levels to a household's particular income circumstances based on predetermined affordability goals. However, since separate billing and payment arrangements must be developed for each participating customer, PIPPs generally entail a somewhat higher level of administrative complexity than straight discount rates. The Colorado Public Utilities Commission recently approved a PIPP for Excel Energy customers. Illinois investor-owned utilities have also implemented a PIPP. In addition, the program model has been operative for many years in Ohio, Pennsylvania, New Jersey and Maine.

Tiered discount

A tiered discount represents a hybrid of design elements of straight discount and PIPP models. In a tiered discount, the level of the discount depends on the customer's income or poverty level. Like a PIPP, the tiered discount is designed to reduce a customer's bill to an affordable level, and households in the lower income or poverty tiers receive a steeper discount than those in higher tiers. Thus, benefits are targeted according to a household's income circumstances, but the individual payment arrangements and billing typified by a PIPP are not required. A tiered discount entails somewhat higher administrative cost than a straight discount, but considerably less than a PIPP. Tiered discount programs currently operate in New Hampshire and Indiana.

II. PROGRAM DESIGN TEMPLATE

Following is a series of tables and charts illustrating the benefits and costs associated with implementing a comprehensive affordability program, including reduced current bills and management of "preprogram" arrears. The tables and charts draw on data pertaining to Arizona Public Service Company and are presented as an example of template capabilities and outputs. The materials may readily be customized by altering a number of key, utility-specific variables, including number of program participants, average arrearage, billing and expenditure levels, target electricity discount percentage or burden level, and anticipated administrative cost. Inputs related to customer usage, expenditures and revenues are often available through public documents filed by utilities with the Federal Energy Regulatory Commission and the Energy Information Administration. Income and poverty information needed for new proposals is also publicly available.

National Consumer Law Center is prepared to work with state-level advocates, policymakers, regulators and others to modify these tables and charts according to local or state circumstances, in support of proposals for new or enhanced programming.

INCOME TABLES

The tables below draw on publicly available data and are used by advocates to illustrate program need and as program design inputs.

Table 1: FY 2020 POVERTY GUIDELINES FOR THE 48 CONTIGUOUS STATES AND THE DISTRICT OF COLUMBIA

	Ratio of Income to Poverty				
Household Size	**50%**	**75%**	**100%**	**125%**	**150%**
1	$6,380	$9,570	$12,760	$15,950	$19,140
2	$8,620	$12,930	$17,240	$21,550	$25,860
3	$10,860	$16,290	$21,720	$27,150	$32,580
4	$13,100	$19,650	$26,200	$32,750	$39,300
5	$15,340	$23,010	$30,680	$38,350	$46,020
6	$17,580	$26,370	$35,160	$43,950	$52,740
7	$19,820	$29,730	$39,640	$49,550	$59,460
8	$22,060	$33,090	$44,120	$55,150	$66,180

Source: U.S. Department of Health and Human Services

Table 2: FY 2020 AZ STATE MEDIAN INCOME

Household Size	60%	80%	100%
1	$23,516.48	$31,355.31	$39,194.13
2	$30,752.32	$41,003.09	$51,253.87
3	$37,988.16	$50,650.88	$63,313.60
4	$45,224.00	$60,298.67	$75,373.33
5	$52,459.84	$69,946.45	$87,433.07
6	$59,695.68	$79,594.24	$99,492.80
7	$61,052.40	$81,403.20	$101,754.00
8	$62,409.12	$83,212.16	$104,015.20
9	$63,765.84	$85,021.12	$106,276.40
10	$65,122.56	$86,830.08	$108,537.60
11	$66,479.28	$88,639.04	$110,798.80
12	$67,836.00	$90,448.00	$113,060.00

Source: U.S. Department of Health and Human Services

Table 3: AZ Minimum Wage

Hourly	$12.00
Annual (40 hours/week x 52 weeks)	$24,960

Source: U.S. Department of Labor

PROGAM DESIGN WORKSHEETS

The tables below reflect design parameters of 3 program types: a 30% straight discount, a tiered discount, and a percentage of income payment plan. Each of the program design worksheets incorporate and arrearage management component. As noted previously, template inputs may readily be adjusted to reflect a broad range of customer participation, program benefit, average arrearage, and program administrative cost scenarios.

Table 4: APS Straight Discount Worksheet

% Discount	30%	**Average Pre-program Arrearage**	$200	**#Participants**	20,000

Program Benefits

Number of Participants	*Undiscounted Annual Bill (FF1)*	*Discounted Annual Bill*	*Value of Discount per Customer*	*Average Arrearage per Customer*	*Total Benefits per participant*
20,000	$1,680	$1,175.81	$504	$200	$704

Annual Expenditure	**$1,680**	Program Administration (% of Arrearage Write-down + Discounts)	**5%**

Program Costs

Total $ Discount	*Total $ Arrearage Write-down*	*Total $ Program Administration*	*Total $*
$10,078,398	$4,000,000	$703,919.90	$14,782,318

Table 5: APS Tiered Discount Worksheet

Target Burden	6.0%	Average Pre-program Arrearage	$200	# Participants per tier	6667	Annual Expenditure	$1,680	Program Administration (% of Arrearage Write-down + Discounts)	5%

Ratio of Income to Poverty Brackets		***Income Brackets, Households, Expenditures, and Discounts***									
Lower	**Upper**	***Income at Category Midpt: 2-person HH***	***# HH***	***Avg. Annual Electricity Expenditure***	***Target Burden***	***Expenditure @ Target Burden***	***Annual Discount***	***Monthly Discount***	***% Discount***	***Avg. Arrearage per Customer***	***Total Benefits per participant***
0.00	0.75	$6,465	6,667	$1,680	6.0%	$388	$1,292	$108	76.9%	$200	$1,492
0.76	1.25	$17,326	6,667	$1,680	6.0%	$1,040	$640	$53	38.1%	$200	$840
1.26	1.50	$23,791	6,667	$1,680	6.0%	$1,427	$252	$21	15.0%	$200	$452
Weighted Avg. Discount			**43.3%**								

Program Costs

Total $ Discount per Tier	*Total $ Arrearage Write-down per Tier*	*Total $ Program Administration per Tier*	*Total $ per Tier*
$8,612,220	$1,333,333	$497,278	$10,442,831
$4,267,740	$1,333,333	$280,054	$5,881,127
$1,681,740	$1,333,333	$150,754	$3,165,827

Total Program Cost

$14,561,700	***$4,000,000***	***$928,085***	***$19,489,785***

Table 6: APS PIPP Worksheet

Target Burden	6.0%	Avg Pre-program Arrearage	$200	# Participants per tier	20,000	Annual Expenditure	$1,680	Program Administration*	5%

Income Brackets, Households, Expenditures, and Discounts

Selected Poverty Level (2-person Household)	Annual HH Income	# HH	Average Annual Electricity Expenditure	Target Burden	Expenditure @ Target Burden	Annual Discount	Monthly Discount	Percentage Discount
50%	$8,620	6,667	$1,680	6.0%	$517	$1,163	$97	69.2%
100%	$17,240	6,667	$1,680	6.0%	$1,034	$645	$54	38.4%
125%	$21,550	6,667	$1,680	6.0%	$1,293	$387	$32	23.0%
Weighted Avg. Discount		**43.6%**						

Program Costs

Selected Poverty Level (2-person Household)	Total $ Discount	Total Arrearage Write-down	Total Program Administration	Total
50%	$7,750,220	$1,333,333	$454,177.67	$9,537,731
100%	$4,302,220	$1,333,333	$281,777.67	$5,917,331
125%	$2,578,220	$1,333,333	$195,577.67	$4,107,131
Total Program Costs				
	$14,630,660	***$4,000,000***	***$931,533***	***$19,562,193***

*(% of Arrearage Write-down + Discounts)

BURDEN IMPACTS

The tables and graphs below illustrate the electricity burden reduction impacts of prospective bill affordability and arrearage management program implementation.

Table 7: Electricity Burden Impacts: 30% Discount

	Single, Minimum Wage* Worker (40 hours x 52 weeks)	2-person HH, 100% 2019 FPL	2-person HH, 150% 2019 FPL	2-Person Median Income HH	Upper-income HH ($100,000)
Annual Pretax Income	$24,960	$17,240	$25,860	$51,254	$100,000
Monthly Pretax Income	$2,080	$1,437	$2,155	$4,271	$8,333
Undiscounted Current Annual Electricity Expenditure	$1,680	$1,680	$1,680	$1,680	$1,680
Undiscounted Current Monthly Electricity Expenditure	$140	$140	$140	$140	$140
Arrearage Payment ($200/4)	$50	$50	$50	$0	$0
Total Undiscounted Monthly Payment	$190	$190	$190	$140	$140
Undiscounted Electricity Burden (During Arrearage Payoff)	9.1%	13.2%	8.8%	3.3%	1.7%
Discounted (30%) Electricity Expenditure	$1,176	$1,260	$1,260	$1,680	$1,680
Discounted Electricity Burden	4.7%	7.3%	4.9%	3.3%	1.7%

Table 8: Electricity Burden Impacts: Tiered Discount (6% Target Burden)

	Single, Minimum Wage* Worker (40 hours x 52 weeks)	2-person HH, 100% 2019 FPL	2-person HH, 150% 2019 FPL	2-Person Median Income HH	Upper-income HH ($100,000)
Annual Pretax Income	$24,960	$17,240	$25,860	$51,254	$100,000
Monthly Pretax Income	$2,080	$1,437	$2,155	$4,271	$8,333
Undiscounted Current Annual Electricity Expenditure	$1,680	$1,680	$1,680	$1,680	$1,680
Undiscounted Current Monthly Electricity Expenditure	$140	$140	$140	$140	$140
Arrearage Payment ($200/4)	$50	$50	$50	$0	$0
Total Undiscounted Monthly Payment	$190	$190	$190	$140	$140
Undiscounted Electricity Burden (During Arrearage Payoff)	9.1%	13.2%	8.8%	3.3%	1.7%
Discounted Electricity Expenditure	$1,039.57	$1,039.57	$1,427.47	$1,680	$1,680
Discounted Electricity Burden	4.2%	6.0%	5.5%	3.3%	1.7%

Table 9: Electricity Burden Impacts: PIPP Discount (6% Target Burden)

	Single, Minimum Wage* Worker (40 hours x 52 weeks)	2-person HH, 100% 2019 FPL	2-person HH, 150% 2019 FPL	2-Person Median Income HH	Upper-income HH ($100,000)
Annual Pretax Income	$24,960	$17,240	$25,860	$51,254	$100,000
Monthly Pretax Income	$2,080	$1,437	$2,155	$4,271	$8,333
Undiscounted Current Annual Electricity Expenditure	$1,680	$1,680	$1,680	$1,680	$1,680
Undiscounted Current Monthly Electricity Expenditure	$140	$140	$140	$140	$140
Arrearage Payment ($200/4)	$50	$50	$50	$0	$0
Total Undiscounted Monthly Payment	$190	$190	$190	$140	$140
Undiscounted Electricity Burden (During Arrearage Payoff)	9.1%	13.2%	8.8%	3.3%	1.7%
Discounted Electricity Expenditure	$1,498	$1,034	$1,552	$1,680	$1,680
Discounted Electricity Burden	6.0%	6.0%	6.0%	3.3%	1.7%

Chart 1: Unequal Burdens:

Electricity Expenditures as a Proportion of Household Income: APS

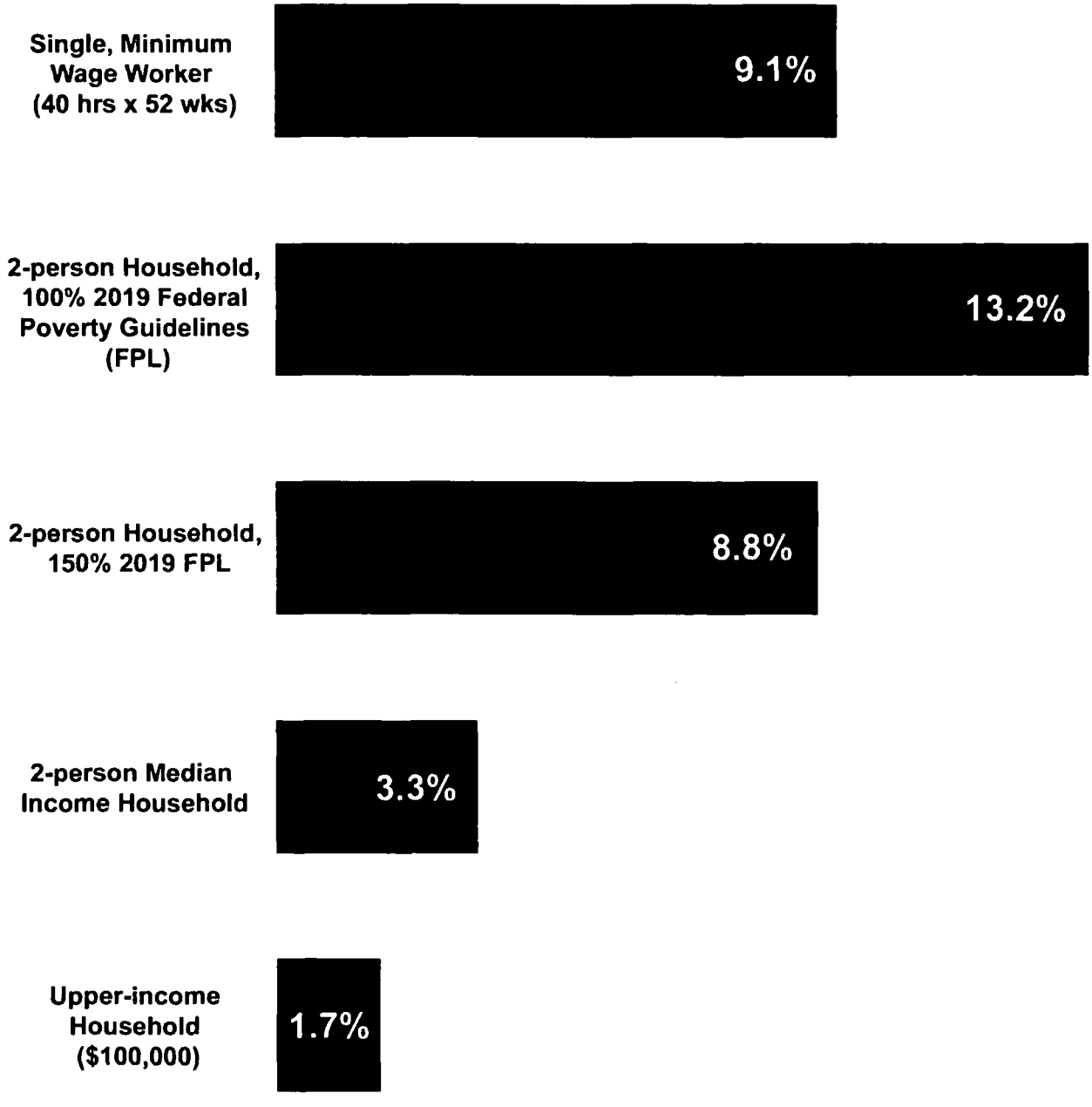


Chart 2: 30% Straight Discount:
Undiscounted & Discounted Electricity Burdens by Selected Household Incomes

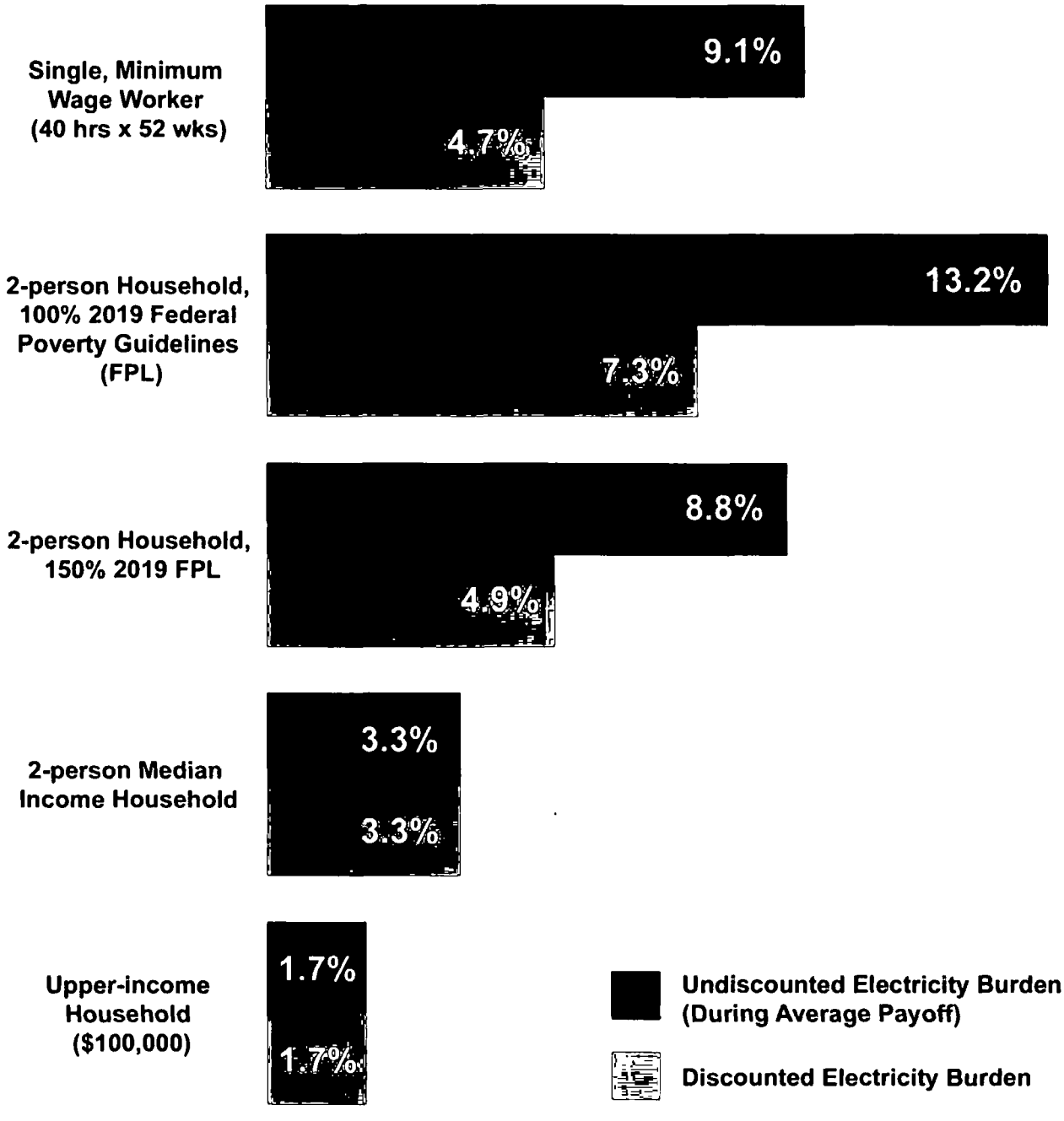


Chart 3: Tiered Discount – 6% Target Burden:
Undiscounted and Discounted Electricity Burdens by Selected Household Incomes

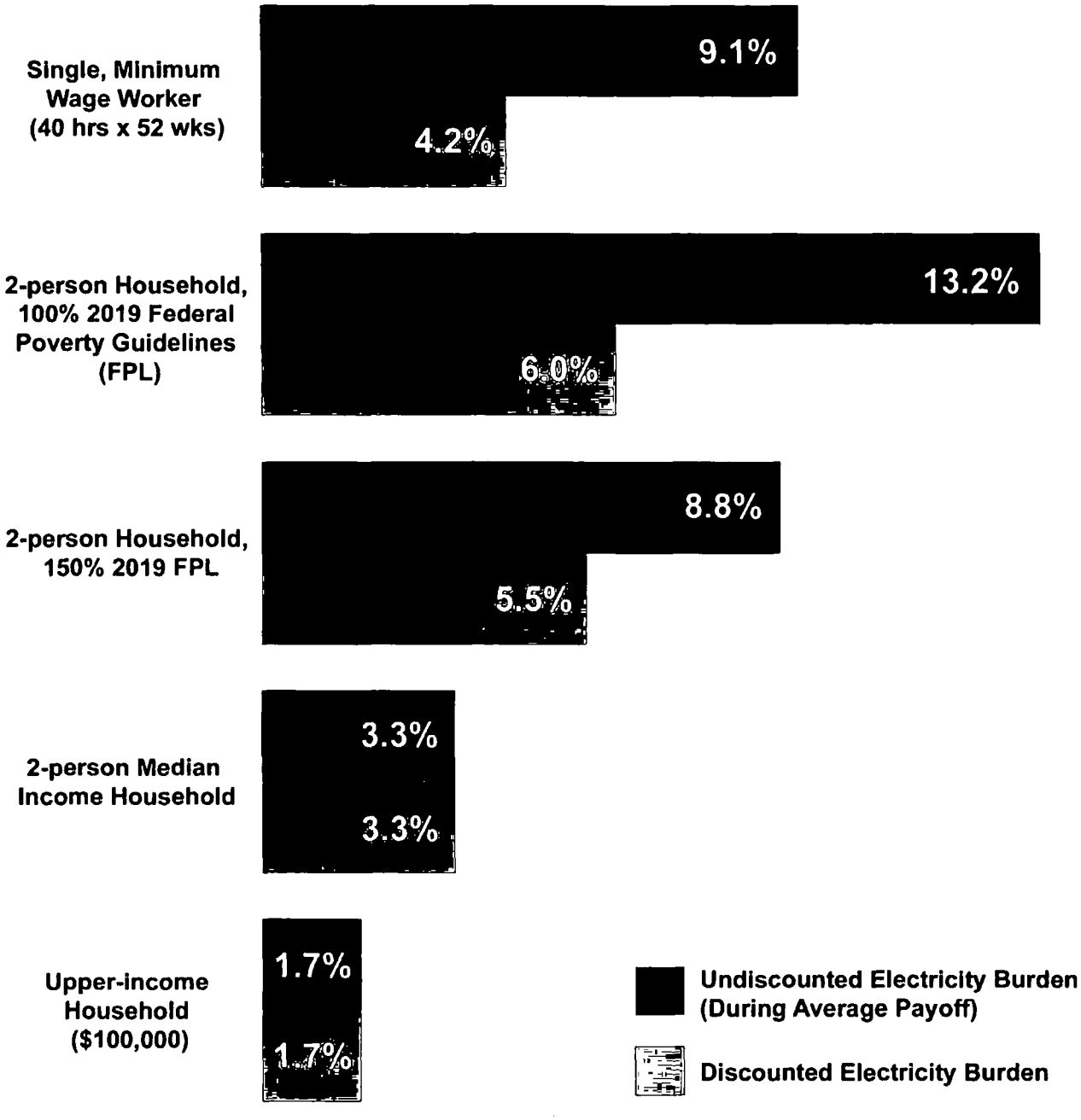
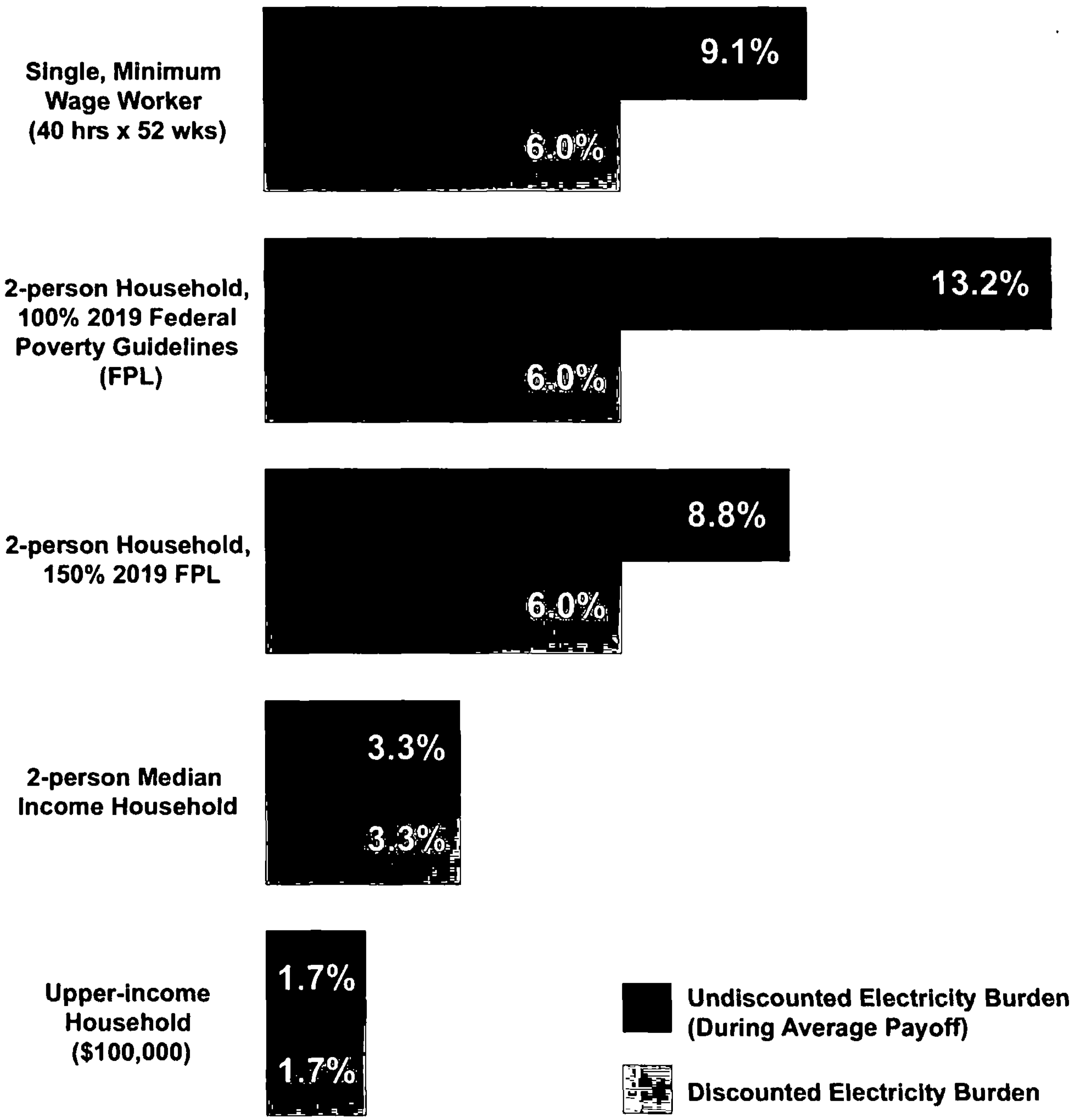


Chart 4: PIPP Discount – 6% Target Burden:
Undiscounted and Discounted Electricity Burdens by Selected Household Income



USAGE, CUSTOMERS, REVENUES AND BILL IMPACTS

The table below was generated using publicly-available data filed by electric utility companies. The table illustrates usage, number of customers, and revenues for each rate and customer class, and can be used to estimate bill impacts of a ratepayer-funded bill assistance/arrearage management program. Program-related bill impact estimates assume a universal volumetric charge applicable to all customer classes.

Table 10: Usage, Customers, Revenues, and Bill Impacts

sched_num_ttl	mwh_sold	revenue	Avg Num cstmr	Kwh Sale cstmr	Revenue Kwh sold	Annual Residential Expenditure	Monthly Residential Expenditure	Monthly bill impact
440 Residential								
E-12	700,407	$95,364,732	102,391	6,841	$0.1362	**$932**	**$78**	**$0.45**
ET-1	266,703	$33,892,316	24,896	10,713	$0.1271	**$1,362**	**$113**	**$0.65**
ET-2	682,426	$87,648,630	68,463	9,968	$0.1284	**$1,280**	**$107**	**$0.61**
ECT-1R	86,943	$10,108,119	4,912	17,700	$0.1163	**$2,059**	**$172**	**$0.99**
ECT-2	336,413	$38,469,840	21,960	15,319	$0.1144	**$1,752**	**$146**	**$0.84**
R-XS	1,098,031	$164,853,437	202,292	5,428	$0.1501	**$815**	**$68**	**$0.39**
R-BASIC	1,079,833	$163,078,732	110,243	9,795	$0.1510	**$1,479**	**$123**	**$0.71**
R-BASICL	704,990	$110,077,223	41,375	17,039	$0.1561	**$2,660**	**$222**	**$1.28**
R-TOU-E	4,272,171	$638,005,054	279,510	15,285	$0.1493	**$2,282**	**$190**	**$1.09**
R-2	710,519	$98,543,232	45,183	15,725	$0.1387	**$2,181**	**$182**	**$1.05**
R-3	2,716,749	$340,793,200	120,162	22,609	$0.1254	**$2,835**	**$236**	**$1.36**
R-TECH	270	$37,231	8	33,750	$0.1379	**$4,654**	**$388**	**$2.23**
E-12 EPR-2,6	76,939	$14,380,698	29,185	2,636	$0.1869	**$493**	**$41**	**$0.24**
ET-1 EPR-2,6	54,862	$7,143,711	8,931	6,143	$0.1302	**$800**	**$67**	**$0.38**
ET-2 EPR-2,6	243,127	$31,851,004	33,762	7,201	$0.1310	**$943**	**$79**	**$0.45**
ECT-1R EPR-2,6	6,594	$1,150,500	552	11,946	$0.1745	**$2,085**	**$174**	**$1.00**
ECT-2 EPR-2,6	29,117	$5,365,070	2,972	9,797	$0.1843	**$1,806**	**$150**	**$0.87**

Table 10: Usage, Customers, Revenues, and Bill Impacts (cont.)

R-TOU-E RCP	35,360	$5,855,729	3,243	10,903	$0.1656	**$1,806**	**$150**	**$0.87**
R-2 RCP	3,560	$542,662	292	12,192	$0.1524	**$1,858**	**$155**	**$0.89**
R-3 RCP	7,189	$1,058,128	483	14,884	$0.1472	**$2,191**	**$183**	**$ 1.05**
R-TECH RCP	19	$2,822	1	19,000	$0.1485	**$2,822**	**$235**	**$1.35**
E-47	1,623	$535,894	0	0	$0.3302	**$0**	**$0**	**$ -**
Green Power	0	$86,482	0	0	$ -	**$0**	**$0**	**$ -**
Total Residential	13,113,845	$1,848,844,446	1,100,816	11,913	$0.1410	**$1,680**	**$140**	**$0.81**
							$0	**$ -**
442 Commercial							**$0**	**$ -**
E-20	36,073	$4,849,656	382	94,432	$0.1344	**$12,692**	**$1,058**	**$6.09**
E-30	4,829	$1,326,787	4,312	1,120	$0.2748	**$308**	**$26**	**$0.15**
E-32-XS	1,540,390	$247,524,340	99,149	15,536	$0.1607	**$2,497**	**$208**	**$1.20**
E-32 XS D	3,792	$608,507	203	18,680	$0.1605	**$2,998**	**$250**	**$1.44**
E-32-S	2,431,063	$328,483,026	18,075	134,499	$0.1351	**$18,171**	**$1,514**	**$8.72**
E-32-M	2,805,493	$312,969,297	3,647	769,260	$0.1116	**$85,849**	**$7,154**	**$41.19**
E-32-L	2,141,694	$205,780,576	594	3,605,545	$0.0961	**$346,493**	**$28,874**	**$166.24**
E-32TXS	2,151	$353,439	145	14,834	$0.1643	**$2,437**	**$203**	**$1.17**
E-32TOUS	26,519	$3,518,003	140	189,421	$0.1327	**$25,136**	**$2,095**	**$12.06**
E-32TOUM	72,547	$7,366,248	64	1,133,547	$0.1015	**$115,055**	**$9,588**	**$55.20**
E-32TOUL	213,868	$18,229,763	35	6,110,514	$0.0852	**$520,616**	**$43,385**	**$249.78**
GS-SCHM	59,297	$7,965,897	91	651,615	$0.1343	**$87,512**	**$7,293**	**$41.99**
GS-SCHL	39,411	$4,718,032	29	1,359,000	$0.1197	**$162,672**	**$13,556**	**$78.05**
E-34	492,818	$40,940,367	17	28,989,294	$0.0831	**$2,409,010**	**$200,751**	**$1,155.77**
E-35	352,958	$30,838,974	13	27,150,615	$0.0874	**$2,372,964**	**$197,747**	**$1,138.47**
E-221	338,490	$35,564,382	1,331	254,313	$0.1051	**$26,728**	**$2,227**	**$12.82**
E-47	19,976	$8,642,128	0	0	$0.4326	**$0**	**$0**	**$ -**

Table 10: Usage, Customers, Revenues, and Bill Impacts (cont.)

Green Power	0	$222,857	0	0	$ -	**$0**	**$0**	**$ -**
EPR-2	7,903	$808,194	25	316,120	$0.1023	**$32,339**	**$2,695**	**$15.52**
EPR-6	568,457	$68,897,737	1,205	471,749	$0.1212	**$57,176**	**$4,765**	**$27.43**
E-56	3,378	$745,755	1	3,378,000	$0.2208	**$745,862**	**$62,155**	**$357.84**
E-56R	152,576	$14,074,455	19	8,030,316	$0.0922	**$740,395**	**$61,700**	**$355.22**
AG-X	1,033,685	$70,307,462	116	8,911,078	$0.0680	**$605,953**	**$50,496**	**$290.72**
Total Commercial	12,347,368	$1,414,735,882	129,593	95,278	$0.1146	**$10,919**	**$910**	**$5.24**
							$0	**$ -**
442 Industrial and Irrigation							**$0**	**$ -**
E-30	60	$19,705	76	789	$0.3284	**$259**	**$22**	**$0.12**
E-32-XS	31,987	$5,245,574	2,327	13,746	$0.1640	**$2,254**	**$188**	**$1.08**
E-32 XS D	50	$7,045	1	50,000	$0.1409	**$7,045**	**$587**	**$3.38**
E-32-S	83,152	$12,875,473	756	109,989	$0.1548	**$17,026**	**$1,419**	**$8.17**
E-32-M	214,171	$25,895,483	297	721,114	$0.1209	**$87,183**	**$7,265**	**$41.83**
E-32-L	473,172	$45,615,787	115	4,114,539	$0.0964	**$396,642**	**$33,053**	**$190.30**
E-32TXS	15	$1,950	1	15,000	$0.1300	**$1,950**	**$163**	**$0.94**
E-32TOUS	1,423	$150,729	6	237,167	$0.1059	**$25,116**	**$2,093**	**$12.05**
E-32TOUM	3,777	$502,021	6	629,500	$0.1329	**$83,661**	**$6,972**	**$40.14**
E-32TOUL	50,226	$4,503,984	8	6,278,250	$0.0897	**$563,159**	**$46,930**	**$270.19**
E-34	124,484	$9,918,120	5	24,896,800	$0.0797	**$1,984,275**	**$165,356**	**$951.99**
E-35	567,699	$43,513,937	15	37,846,600	$0.0766	**$2,899,050**	**$241,587**	**$1,390.87**
E-36 XL	47,204	$3,751,238	1	47,204,000	$0.0795	**$3,752,718**	**$312,727**	**$1,800.44**
E-221	10,017	$1,126,787	87	115,138	$0.1125	**$12,953**	**$1,079**	**$6.21**
E-47	567	$169,667	0	0	$0.2992	**$0**	**$0**	**$ -**
EPR-6	27,651	$3,327,090	24	1,152,125	$0.1203	**$138,601**	**$11,550**	**$66.50**
AG-X	601,898	$31,759,995	3	200,632,667	$0.0528	**$10,593,405**	**$882,784**	**$5,082.38**

Table 10: Usage, Customers, Revenues, and Bill Impacts (cont.)

Total Industrials & Irrigation	2,237,553	$188,384,585	3,728	600,202	$0.0842	**$50,537**	**$4,211**	**$24.25**
	0	$ -	0	0	$ -	**$0**	**$0**	$ -
444 Public Street Lighting	138,266	$21,805,883	1,169	118,277	$0.1577	**$18,652**	**$1,554**	**$8.95**
Total Public Street Lighting	138,266	$21,805,883	1,169	118,277	$0.1577	**$18,652**	**$1,554**	**$8.95**
						$0	**$0**	$ -
445 Other Public Authorities	1,932	$126,762	145	13,324	$0.0656	**$874**	**$73**	**$0.42**
Total Other Public Authorities	1,932	$126,762	145	13,324	$0.0656	**$874**	**$73**	**$0.42**
Unbilled MWh & Revenue								
Residential Unbilled	76,637	$18,524,796	0	0	$0.2417	**$0**	**$0**	
Commercial Unbilled	41,044	$4,957,866	0	0	$0.1208	**$0**	**$0**	
Ind & Irrig. Unbilled	-13,285	$(1,124,145)	0	0	$0.0846	**$0**	**$0**	
Public Str Lighting Unbilled	27	$5,467	0	0	$0.2025	**$0**	**$0**	
Other Public Auth Unbilled						**$0**	**$0**	
Total Unbilled MWh & Revenue	104,423	$22,363,984	0	0	$0.2142	**$0**	**$0**	
	0	$ -	0	0	$ -			

Table 10: Usage, Customers, Revenues, and Bill Impacts (cont.)

449.1 Provision for Rate Refunds	0	$216,071	0	0	$ -		
Total Provisions for Rate Refunds	0	$216,071	0	0	$ -		
Total Sales (MWH) and Revenue From Sales ($)	***27,838,964***	***$3,473,897,558***					
$20M Program Percent of Revenues From Sales		0.58%					

Source: Arizona Public Service Company 2018 FERC Form 1, p. 304.

III. CONCLUSION

To win approval of programs and policies to enhance secure access to home energy services, advocates must "make the case" for program need and present a data-driven proposal outlining program design parameters. National Consumer Law Center has developed customizable templates to aid advocates and consumers in developing proposals for the implementation of comprehensive electric service bill payment assistance and arrearage management programs. The tables and charts in this report provide an example of template capabilities and outputs.

For technical assistance in developing a customized affordable bill program proposal, contact National Consumer Law Center Senior Energy Analyst John Howat at jhowat@nclc.org

National
Consumer Law
Center

NATIONAL HEADQUARTERS

7 Winthrop Square, Boston, MA 02110
(617) 542-8010

NCLC.ORG

WASHINGTON OFFICE

Spanogle Institute for Consumer Advocacy
1001 Connecticut Ave, NW, Suite 510
Washington, DC, 20036
(202) 452-6252

ATTACHMENT E

Vote Solar Comments

Docket No. PUR-2020-00048

NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER ADVOCATES
Resolution 2020-01

NASUCA Recommendations Concerning the Effects of the Public Health and Economic Crises Resulting from COVID-19 upon Utility Rates and Services Provided to Consumers by Public Utilities

Whereas, on January 30, 2020 the World Health Organization (WHO) declared the novel coronavirus outbreak (COVID-19) a Public Health Emergency of International Concern (PHEIC)[i]. By March 11, 2020 the WHO characterized COVID-19 as a world pandemic; and

Whereas, on January 31, 2020 the Secretary of the United State Department of Health and Human Services declared a public health emergency related to the COVID-19[ii]. On March 13, 2020 the President of United States declared that the COVID-19 outbreak in the United States constituted a national emergency[iii]; and

Whereas, during this national emergency, extraordinary actions have been instituted by State Governors and the federal government to reduce social contact with the goal of preventing the spread of the COVID-19 virus. Many businesses have been declared non-essential during the crisis and temporarily closed. Many states have issued temporary orders for citizens to shelter-in-place and avoid all non-essential movement away from home. Schools have been closed in many states. These emergency actions have resulted in record unemployment, widespread financial hardship and severe contraction of state economies; and

Whereas, to reduce the economic impact of this national emergency the United States Congress has passed, and the President has signed, several laws that offer financial support for states, citizens and businesses, some of which specifically include funding for essential utility services; and

Whereas, State governors and state public utility commissions and consumer advocates have taken steps to order or request voluntary compliance, and utilities and communications providers have taken steps either voluntarily or pursuant to orders, to stop disconnecting consumers that are unable to pay for service during the national emergency, to reconnect service for consumers that were disconnected prior to the national emergency, and to cease other collection activity temporarily; and

Whereas, the national crisis caused by COVID-19 is extraordinary in its breadth and depth, and the speed of its onset. While the ultimate depth and duration of the economic crisis is unknown, the initial impact of the economic crisis has been severe, resulting in closed businesses, disruption to the economy and millions unemployed,[iv] many of whom are struggling to meet basic needs such as buying food and medicine, paying for shelter and paying for vital utilities; and

Whereas, the end of the COVID-19 virus public health emergency, however defined, will not correspond to the end of the economic crisis. Many utility consumers are already behind on, or will fall behind on their utility bills, and will need uniform programmatic assistance and financial

help getting back on their feet. This includes payment arrangements covering much longer time periods than normal, discount/assistance plans where none currently exist or expansion of existing plans; and

Whereas, access to electricity, water, natural gas and communications networks are essential for the health, safety, and welfare of all people, and that particularly during this unparalleled crisis broadband communications has played a vital role in protecting and furthering the health, safety and welfare of the States and their peoples; and

Whereas, small water and wastewater utilities have unique liquidity and infrastructure needs that must be addressed. Due to the lack of population density and the lack of economies of scale, small communities often face hurdles in supporting water and wastewater systems. Urban and rural water systems may also have issues with lead and other contaminants, and face other infrastructure challenges; and

Whereas, one of the goals of regulation besides protecting consumers is to serve as a proxy for the positive results of competition, and competitive enterprises have sought or will seek to reduce costs during this economic crisis.

Now, Therefore, Be It Resolved: Every effort must be made to ensure that universal access to and affordability of utility services are not diminished during this public health and economic crisis. Utilities, regulators and consumer advocates should work together to craft evidence-based solutions that address the unique challenges and burdens faced by all consumers and other stakeholders during this crisis. Such solutions should ensure the continued safe and adequate provision of utility services at affordable rates and under terms and conditions that are reasonable within this new environment; and

Be it further resolved, that: When utilities, states or consumer advocates are communicating with consumers during this crisis, effort should be made to focus on the following:

- Consumers who are having trouble paying their utility bills should be urged to communicate with their utilities early and frequently;
- States, utilities and other service agencies should work together to communicate with utility consumers to ensure access to low income bill payment assistance, weatherization or other energy efficiency programs and any other resources available to help consumers pay arrearages, reduce bills and maintain service;
- Utility consumers should be urged to continue to pay their utility bills if possible, and if they cannot pay in full, to pay some portion of the bill to minimize any balance that will accumulate and be due at a later date; and

Be it further resolved, that: With regard to disconnection moratoria and communication rules between utilities and consumers during this crisis:

- Congress should respect state jurisdictional and decision-making authority to determine the extent and duration of any shutoff moratoria and to control any rules related to disconnections and reconnections, utility communications, payment programs and revenue collection activities;

- State public utility commissions should revisit utility tariffs and other terms and conditions applicable to disconnections, reconnections, late payment penalties and deposits in proceedings to address the economic impacts upon consumers of the ongoing economic crisis and to adopt policies applicable after the crisis ends to protect continued access to vital utility services by providing more time for repayment of past due amounts and reducing the burden of collection-related charges on consumers;
- Utilities should track and publish detailed information about consumer arrearages and shutoffs in a standardized format,[v] while maintaining consumer privacy. Such information should be shared with state commissions and consumer advocates and be publicly available; and

Be it further resolved, that: To help consumers pay utility bills during this crisis, NASUCA believes:

- Congress should provide supplemental funding for fiscal year 2020 and increase funding for subsequent fiscal years through the Low-Income Home Energy Assistance Programs (LIHEAP) and other funding mechanisms to address heating and cooling bills for consumers impacted by the COVID-19 crisis;
- Congress should create and fund a LIHEAP type mechanism to assist low-income water and wastewater utility consumers in paying their bills;
- Congress should consider providing direct support to utilities to assist consumers that may not otherwise qualify for LIHEAP assistance, including providing direct funding to utilities to reduce consumer arrearages and provide bill credits to help consumers maintain service;
- States should review and relax LIHEAP income eligibility standards to allow a wider range of consumers to qualify for assistance;
- States should consider adopting or strengthening bill payment assistance programs such as discounted rates, Percentage of Income Payment Plans (PIPPs) and arrearage management or arrearage reduction programs; and

Be it further resolved that: Accounting and utility operating cost:

- State commissions are urged to identify cost reductions when evaluating utility requests to defer COVID-19 cost increases as a regulatory asset;
- Congress should eliminate the normalization requirement contained in the Tax Cuts and Jobs Act of 2017 associated with the flowback of excess protected accumulated deferred income taxes to allow state commissions more flexibility to use these consumer-supplied funds to offset expenses; and

Be it further resolved, that: Broadband, telephone and cable:

- To facilitate the additional capacity necessary to support telemedicine and education and commerce, Congress should work with states and increase funding to appropriate state government agencies or create incentives for investor-owned broadband internet access providers to expand broadband capability and availability in all areas, but with additional focus on unserved and underserved areas to reduce the impact of the digital divide;
- Communications providers should sign the FCC's Keep Americans Connected Pledge and should extend the protections of that Pledge through August 2020;

- Communications providers should consider additional protections and relief programs for consumers that extend beyond the terms of the FCC's Keep Americans Connected Pledge, including, among other things, making every effort to find workable arrangements to allow consumers to pay any arrearages caused by the COVID-19 crisis over a reasonable period of time after the crisis eases;
- To ensure consumers have access to local news and community television channels—which may be the only sources of COVID-19 or other emergency-related information for certain consumers, cable television providers should consider extending the protections of the FCC's Keep Americans Connected Pledge to basic cable service and consider allowing consumers that cannot pay their bills for other levels of service to downgrade to basic cable service, without additional costs or fees, in lieu of disconnection, through August 2020 or 60 days after the end of the public health emergency, whichever is later;
- NASUCA affirms its historic support for universal service and affordability, service quality and the need for telephone service to reach as close as practicable to 100% of low-income households in the United States, as was originally provided for by the Communications Act of 1934 and the 1985 Lifeline amendments thereto, and as such programs are consistent with NASUCA policy positions taken over time in its resolutions and legal action(s); and NASUCA supports the uncapping and increasing of the Lifeline program funds so that for the duration of this public health and economic crisis the funding of such program is sufficient to meet need, provided that such reasonable protections against waste be retained to protect the public and NASUCA supports the expansion of the provision of voice minutes, text messages and broadband internet access over wireless Lifeline phones such that vulnerable families will retain full and reasonable access to online education, government, health/telemedicine and public safety services; and

Be it further resolved, that: Consumer access to utility-supplied water and wastewater services is critical to consumer health and safety:

- NASUCA affirms its support for legislation to fund critical water and wastewater infrastructure technical assistance and workforce development needs especially for small systems and systems burdened by lead and other nationally recognized contaminants. And all such action should focus upon maintaining or creating affordability, safety and potability of drinking water.

Be it further resolved, that NASUCA authorizes its Executive Committee to develop specific positions and take appropriate actions, consistent with the terms of this resolution and the needs of its Members and their utility consumers. The Executive Committee shall notify the membership of any action pursuant to this resolution.

Submitted by the COVID-19 Response Subcommittee
Passed by Membership Vote May 12, 2020

Abstained

Kentucky AG	Ohio	Oklahoma AG
Tennessee AG	Texas	

Endnotes

i https://www.who.int/news-room/detail/27-04-2020-who-timeline---covid-19

ii https://www.hhs.gov/about/news/2020/01/31/secretary-azar-declares-public-health-emergency-us-2019-novel-coronavirus.html

iii https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/

iv The U.S. Department of Labor reports that 16.4 million Americans are unemployed as of April 18, 2020 https://www.dol.gov/ui/data.pdf.

v https://www.nasuca.org/nwp/wp-content/uploads/2018/11/2019-07-NASUCA-Data-Collection-Resolution-Joint-with-NARUC-Final.pdf; https://www.nasuca.org/2018-04-data-collection-resolution/